



CREDO PETROLEUM CORPORATION

February 5, 1996



Mr. David S. Guzy, Chief
Rules and Procedures Staff
Mineral Management Service
Royalty Management Program
P. O. Box 25165, MS 3101
Denver, CO 80225-0165

Re: Comments--Proposed Rulemaking--
Amendments to Gas Valuation
Regulations for Federal Leases,
60 Fed. Reg. 56007, et seq.

Dear Mr. Guzy:

CREDO Petroleum Corporation appreciates the opportunity to comment on this rulemaking. This company is an independent producer in the Rocky Mountain region and a member of the Independent Petroleum Association of Mountain. CREDO operates and owns interests in a number of wells located on Federal lands.

While some of the proposals will be helpful, we are concerned that the proposed rule will have an overall negative economic impact on our operations on Federal lands. We support the positive aspects of the proposal such as the elimination of processing and transportation allowance forms and dual accounting, a new definition of gathering, deduction of downstream compression, and valuation of NGL's at a wellhead MMBtu basis.

While we recognize that the Negotiated Rulemaking Committee worked many hours to develop a valuation system which would benefit all parties, **we believe that the cost/benefit ratio of the very complex index system will be onerous for independent oil and gas operators.** Although independents will be able to stay on the gross proceeds methodology, the complexity of the proposed valuation methodology in its entirety is contrary to the basic mission of the FACA Committee. Such a complex system, coupled with requiring producers to pay on entitlements, whether the producer takes or not, will most definitely discriminate against independents and leave them at a competitive disadvantage with major corporations.

Mr. David S. Guzy, Chief

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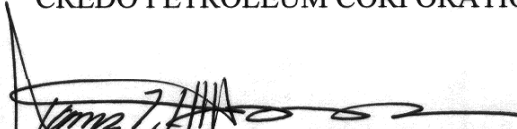
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In summary, the proposed rule with respect to index pricing, the safety net and transportation allowances will increase our costs of operation and thus, increase our overhead at a time when our margins are under severe stress, particularly in the Rocky Mountain region.

We endorse the comments made by IPAMS and IPAA.

Sincerely,

CREDO PETROLEUM CORPORATION



James T. Huffman
President

JTH/lmf